1	THOMAS P. QUINN, JR. (SBN 132268	)
	NOKES & QUINN APC	
2	410 BROADWAY, STE 200	
3	LAGUNA BEACH, CA 92651	
4	Tel: (949) 376-3500	
4	Fax: (949) 376-3070	
5	Email: tquinn@nokesquinn.com	
6	Attomosys for Defendant FOLITEAY INC	
7	Attorneys for Defendant EQUIFAX INC	·•
8	UNITED STATES	DISTRICT COURT
	NORTHERN DISTRICT OF CALIFORNIA	
9		
10		) ~
11	RYAN CHAMBERS,	Case No.:
12	Plaintiff,	}
	Tranitiri,	NOTICE OF REMOVAL
13	$\ _{\mathrm{vs.}}$	}
14		<b>\</b>
15	EQUIFAX INC., et al.,	}
16	Defendants.	}
17	Defendants.	}
18		)
19	Defendant, Equifax Inc., by Coun	sel, hereby files this Notice of Removal of
20	this action from the Contra Costa County Superior Court, California, wherein it is	
21	now pending as Case No. C17-01528 t	to the United States District Court for the
22	Central District of California. This Notice of Removal is filed pursuant to 28	
23	U.S.C. §§ 1441 and 1446. In suppor	t hereof, Defendants show this Court as
24	follows:	

An action was filed on August 15, 2017 in the Contra Costa County Superior Court, California, entitled Chambers v. Equifax Inc., et al. Case No. C17-01528 (the "State Court Action").

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Equifax Inc. was served with the Complaint on August 18, 2017. 2.

- 3. This Notice is being filed with this Court within thirty (30) days after Equifax Inc. was served with a copy of Plaintiffs' initial pleading setting forth the grounds for their action and their claims for relief.
- This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States; specifically 15 U.S.C. § 1681 et seq., otherwise known as the Fair Credit Reporting Act ("FCRA"), as follows:
- Plaintiff's Complaint, on its face, alleges a violation of the FCRA.
- The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions "may be brought in any appropriate United States district court without regard to the amount in controversy . . . "
- Promptly after the filing of this Notice of Removal, Equifax Inc. shall give written notice of the removal to Plaintiff and to the Contra Costa County Superior Court, California, as required by 28 U.S.C. § 1446(d).
- Attached hereto, as Exhibit A, are copies of the Summons and Complaint served upon Equifax Inc. in the State Court Action.

WHEREFORE, Equifax Inc. requests that the above-described action be

NOKES & QUINN

/s/ Thomas P. Quinn, Jr. THOMAS P. QUINN, JR. Attorneys for Defendant EQUIFAX INC.

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1	CERTIFICATE OF SERVICE		
2	Chambers v. Equifax, Inc., et al.		
3	Case No.:		
4	I, the undersigned, certify and declare that I am over the age of 18 year		
5	employed in the County of Orange, State of California, and not a party to the		
6	above-entitled cause.		
7	On <b>September 15, 2017</b> , I served a true copy of:		
	NOTICE OF REMOVAL		
8	[] By personally delivering it to the persons(s) indicated below in the		
9	manner as provided in FRCivP5(B);		
10	[X] By depositing it in the United States Mail in a sealed envelope with the		
11	postage thereon fully prepaid to:		
12	Todd M. Friedman		
13	Adrian R. Bacon		
14	21550 Oxnard St., Suite 780 Woodland Hills, CA 91367		
15	Tel: 877-206-4741		
16	Email: tfriedman@toddflaw.com		
17	Email: abacon@toddflaw.com		
	Thorneys for I willigg Ryan Chambers		
18	[ X ] By ECF: On this date, I electronically filed the following document(s)		
19	with the Clerk of the Court using the CM/ECF system, which sent electronic		
20	notification of such filing to all other parties appearing on the docket sheet;		
21	I hereby certify that I am employed in the office of a member of the Bar of		
22	this Court at whose direction the service was made.		
23	I hereby certify under the penalty of perjury under the laws of the State of		
24	California that the foregoing is true and correct.		
25	/s/ Thomas P. Quinn, Jr.		
26	THOMAS P. QUINN, JR.		
27	Place of Mailing: Laguna Beach, California.		
28	Executed on <b>September 15, 2017,</b> at Laguna Beach, California.		
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1	SERVICE LIST
2	Todd M. Friedman
3	Adrian R. Bacon
4	21550 Oxnard St., Suite 780
5	Woodland Hills, CA 91367 Tel: 877-206-4741
	Email: tfriedman@toddflaw.com
6	Email: abacon@toddflaw.com
7	Attorneys for Plaintiff Ryan Chambers
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